

**REMARKS**

This response is in reply to the Office Action dated April 5, 2006. Claims 1-7 and 9-26 are pending in the application with claims 9-17 and 23-26 being allowed and claims 1-7 and 18-22 being rejected.

The undersigning attorney appreciates the Examiners' time and efforts during a teleconference on May 31, 2006. The teleconference mainly included a discussion of US Patent Application Publication 2003/0068173 (hereinafter Tanizaki), and currently pending claims 1 and 9.

Tanizaki discloses an image forming device as illustrated in Figures 1 and 2 having a main body with an open side. The open side is sized to receive a plurality of developer units and PC units. A door is pivotally mounted to the body and positionable between an open orientation which is illustrated in Figure 2 and a closed orientation illustrated in Figure 1. The media path in this embodiment includes rollers that move the media sheets past the PC units.

Figure 7 illustrates another embodiment with the developer units and PC units positioned within an open side of the main body. The door is pivotally mounted to the body and appears to include a transport belt for moving the media sheets past the PC units (paragraph 0121).

Figures 8 and 9 illustrate yet another embodiment consisting of a cabinet that includes a plurality of PC units. The cabinet is pivotally mounted within a guide at a first location in the main body. The door is pivotally mounted at a second location in the main body that is spaced away from the guide at the first location. The door includes rollers that move the media sheets past the PC units. This embodiment does not disclose a transport belt mounted to the door.

Claim 1 of the present invention has been amended to now more clearly state that both a transport belt and a plurality of photoconductive members are mounted to the subunit causing the subunit and plurality of photoconductive members to be movable about a common point and

remaining in contact when moving between the first orientation and second orientation. As explained above, Tanizaki does not disclose this structure.

Claim 1 was further objected to because it was unclear whether the first and second orientations included in the last two lines of the claim corresponded to the orientations defined in lines 7 - 9 of the claim. Claim 1 has further been amended to demonstrate that these orientations are the same.

Therefore, claim 1 and dependent claims 2 – 7 are not anticipated and are now in condition for allowance.

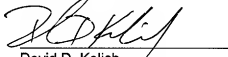
Claim 18 has been amended to now more clearly include that a transport belt is mounted on the subunit and a second unit that includes a photoconductive member and a cleaner is also mounted to the sub unit. The subunit and second unit are movable about a common point to move between image forming and non-forming orientations. Again, this structure is not disclosed in Tanizaki. Therefore, claim 18 and dependent claim 19 are not anticipated and are in condition for allowance.

Claim 20 has also been amended to now state that a photoconductive member is mounted on the subunit, and the subunit forms an exterior section of the image forming device and also includes a transport belt. This structure is not disclosed in Tanizaki. Therefore, claim 20 and dependent claims 21-22 are not anticipated and are in condition for allowance.

The Applicants submit in view of the above remarks and amendments that this application is in condition for allowance and such action is respectfully requested. If any issues remain unresolved, the undersigned attorney requests a telephone interview to expedite allowance and issuance.

Respectfully submitted,

COATS & BENNETT, P.L.L.C.

A handwritten signature in dark ink, appearing to read 'D. Kalish', is written over a horizontal line.

David D. Kalish  
Registration No.: 42,706

Dated: June 12, 2006

P.O. Box 5  
Raleigh, NC 27602  
Telephone: (919) 854-1844  
Facsimile: (919) 854-2084